



Energizing Life in Our Communities

April 30, 2024

Comments of Public Utility No. 1 of Snohomish County regarding Bonneville Power Administration's Proposed Generation Integration Business Practices

Submitted via email to techforum@bpa.gov

Public Utility District No. 1 of Snohomish County (Snohomish) appreciates Bonneville Power Administration (BPA) staff's continued engagement on Large Generation Integration business practices. Snohomish thanks BPA staff for their responsiveness to feedback through the TC-25 process outlining integration services that bypass the LGIP study process.

Separate Generation Integration Process

Snohomish supports BPA's efforts to develop a separate process for Generation Integration Requests. Having separate processes for Generation Integrations for resources on customer distribution systems allows for processes to be tailored for those applications.

Study Bypass

Snohomish supports BPA's study bypass process for generation integrations. Allowing host utilities to bypass the study process for projects that can demonstrate no outside impact preserves valuable BPA staff time and improves the efficiency of the study process.

Meter Installation

Snohomish appreciates working with BPA to facilitate meter installations and requests the following change to section 6 of the proposed business practice, highlighted in red font.

6. In certain cases where a utility is connecting a generating or energy storage resource of 3 MW or less nameplate capacity to its distribution system, and the resource will operate in the BPA BAA, and the resource will be used to serve the utility's load, the metering required by BPA should be installed by the utility. **The utility may also install the**

metering required by BPA for a generating or energy storage resource of 3 MW or more nameplate capacity that otherwise meets the above criteria upon mutual agreement of BPA and the utility. Details can be found in the “Responsibilities and Technical Requirements Guide for Customer Owned Meters” posted on the Metering Services webpage.

The purpose of the proposed redline is to retain existing flexibility that may help BPA manage staff resources and help provide utilities more tools to achieve project timeline goals. Without additional language, there may be a risk of new policy language creating uncertainty or an unintended change in existing policy.